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23 *Three Steps Ahead, Inc.*  
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24 Ramin Sarup

25 Fetaiaki Teaupa  
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26 *Pro se Defendant*  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

FERRARA CANDY COMPANY

Plaintiff,

v.

3615 MARKET LLC, THREE STEPS  
AHEAD, INC., JOKES UP ICE  
KREAM, LLC, NICHOLAS CORWIN,  
FETAIKI TEAUPA, and RAMIN  
SARUP,

Defendants.

Case No. 3:24-cv-07486-RFL

**JOINT STIPULATION AND  
~~PROPOSED~~ ORDER TO AMEND  
SCHEDULING ORDER**

Judge: Hon. Rita F. Lin

Plaintiff Ferrara Candy Company (“Plaintiff”) and Defendants 3615 Market LLC Three Steps Ahead, Inc., Nicholas Corwin, Ramin Sarup, and Fetaiaki Teaupa (“Defendants”) (collectively the “Parties”) submit this Joint Stipulation and Proposed Order to Amend the Scheduling Order in accordance with the stipulated schedule set forth herein.

WHEREAS, the current deadline to notice depositions is July 18, 2025;

WHEREAS, the current fact discovery deadline is August 22, 2025;

WHEREAS, the Court issued an order on June 30, 2025, setting aside entry of default against Defendant Fetaiaki Teaupa and setting July 21, 2025, as the deadline to answer the complaint (Dkt. 67);

WHEREAS, the current Scheduling Order (Dkt. 30) does not allow the Parties to complete discovery in view of the Court’s Order of June 30, 2025;

WHEREAS the Parties believe that a sixty (60) day extension of the discovery cut-off dates and deadlines set forth in the Scheduling Order is necessary and desirable to ensure adequate time for the Parties to conduct relevant discovery;

WHEREAS, for dates that fall on a Saturday or holiday, the Parties have moved the dates to the next day that does not fall on a weekend or holiday, and the Parties have made adjustments in accordance with Judge Lin’s hearing and trial calendar dates;

WHEREAS, for these reasons, good cause exists to extend the discovery cut-off dates and certain scheduling order deadlines by sixty (60) days;

THEREFORE, the Parties hereby stipulate and agree to, and respectfully request that the Court amend the Scheduling Order as follows:

Event	Current Deadline	Proposed Deadline
Last Day to Notice Depositions	7/18/2025	9/16/2025
Close of Fact Discovery	8/22/2025	10/21/2025
Initial Expert Reports	9/5/2025	11/4/2025
Rebuttal Expert Reports	9/26/2025	11/25/2025
Close of Expert Discovery	10/10/2025	12/9/2025
Dispositive Motions	10/28/2025	12/29/2025
Dispositive Motion Hearing	12/9/2025	2/10/2026
Pretrial Conference	2/10/2026	4/14/2026
Jury Selection/Jury Trial	3/9/2026	5/11/2026

All other provisions of the Scheduling Order shall remain in effect.

Date: July 11, 2025

ALSTON & BIRD LLP

By: /s/ Theresa Conduah

Theresa Conduah

Attorneys for Ferrara Candy Company

Date: July 11, 2025

FINNEGAN, HENDERSON,  
FARABOW, GARRETT &  
DUNNER, LLP

By: /s/ Naresh Kilaru

Naresh Kilaru

Attorneys for Defendants

3615 Market LLC

Three Steps Ahead, Inc.

Nicholas Corwin

Ramin Sarup

1  
2 Date: July 11, 2025

Fetaiaki Teaupa

3 By: /s/ Fetaiaki Teaupa

4 Fetaiaki Teaupa

5 *Pro se* Defendant

6 **SIGNATURE ATTESTATION**

7 The undersigned attests that concurrence in the filing of the document has been obtained  
8 from each of the other signatories, consistent with Local Rule 5-1(i).

9  
10 Date: July 11, 2025


By: /s/ Theresa Conduah

11 Theresa Conduah

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1 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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3 DATED: July 14, 2025

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Honorable Rita F. Lin  
United States District Judge